

### **REMARKS**

Claim 24 has been amended for purposes of clarity.

Entry of the above amendments is respectfully requested. Review and reconsideration on the merits are further requested.

Applicants acknowledge the Examiner's withdrawal of the rejections under 35 U.S.C. §103(a) over Tarumi et al. in view of Jonas et al; over Tarumi et al. in view of Jonas et al. and Chen et al.; and over Tarumi et al. in view of Krafft et al.

Claims 1, 4-13, 17-19, and 21-25 have been rejected over Tarumi et al. in view of Jonas et al. and Newkirk. In response, Applicants traverse the rejection.

Tarumi et al. relates to an intermediate transfer roller. Tarumi et al. further teaches various possible layers for the transfer member substrate. These layer materials include metals such as nickel, and resins such as polyethylene terephthalate, polyurethane resin and polycarbonate resin. Tarumi et al. does not teach a belt component as claimed. Instead, Tarumi et al. teaches a toner carrier roller having a cylindrical substrate. Also, Tarumi et al. does not teach the substrate materials as claimed, including fluoropolymers, chloropolymers, silicone rubbers, polyarylenes, ethylene diene propene monomers, nitrile rubbers, and mixtures thereof. In addition, Tarumi et al. does not teach or suggest use of a thiophene-based material as a coating.

Jonas et al. is relied upon as teaching a thiophene-based material. Applicants submit that one of ordinary skill would not have been motivated to combine the references because Tarumi et al. teaches an intermediate transfer member, whereas Jonas et al. relates to conductive polythiophene formulations for electrodes in electroluminescent displays or for solid capacitors, and for picture production such as silver halide photography dry-plate systems and electrophotography.

Newkirk relates to a fuser member coating.

Applicants submit that one of ordinary skill in the art would not have been motivated to combine three references, which contain such diverse teachings.

Specifically, Jonas et al. relates to thiophene-based materials useful for coating electrodes in the electrical arts and for use in picture production. Tarumi et al. relates to intermediate transfer member coatings. Newkirk relates to fuser member coatings. Applicants submit that one of ordinary skill in the art would not have been motivated to use as a substrate, an intermediate coating of an intermediate transfer member as taught by Tarumi et al., and substitute a specific fluoroelastomer of a fuser member for that coating, and subsequently coat the fluoroelastomer with a thiophene-based material taught as useful as a coating in the electrical arts and for picture making as taught by Jonas et al. To make such changes to each of the references and end up with the claimed invention could only be achieved in hindsight.

In addition, Tarumi et al. and Jonas et al. do not teach or suggest a belt as claimed. Instead, Tarumi et al. teaches a toner carrier roller having a cylindrical substrate. Similarly, Jonas et al. teaches electrodes. Applicants submit that belts are completed different from rollers. A belt must possess the properties of being flexible enough to undergo cycling around two rollers, and yet strong enough to withstand multiple cycling for industrial use. On the other hand, a roller does not have to possess these properties. A roller coating does not need to be flexible. Instead, a roller coating should be conformable in order to "give" when the roller comes in contact with other xerographic members, components, particles such as carrier and/or developer, copy substrates, and the like.

Applicants submit that the teachings of Newkirk et al. would not have motivated one of ordinary skill in the art to use a belt in combination with a substrate comprising a polymer as claimed, and a coating composition comprising a thiophene-based material. Newkirk does teach a belt component as depicted in Figure 5 of the reference. However, as set forth in column 11, lines 1-3 of Newkirk, the belt comprises a support layer (substrate) of heat conductive material such as metal. Therefore, Newkirk teaches away from using a polymeric material for the substrate as claimed.

The three references have diverse teachings of substrates including 1) a toner carrier roller (Tarumi et al.) having substrate materials including fluoropolymers, chloropolymers, silicone rubbers, polyarylenes, ethylene diene propene monomers, nitrile rubbers, and mixtures thereof, 2) electrode substrates of glass or plastic films (e.g., polyesters such as polyethylene terephthalate or polyethylene naphthalate, polycarbonate, polyacrylate, polysulphone or polyimide) (Jonas et al.), and 3) belt substrates of metal. Applicants submit that one of ordinary skill, faced with the combination of such diverse teachings of substrates would not have been motivated to combine the references.

In view of the above arguments, Applicants submit that the claims are not obvious over Tarumi et al. in view of Jonas et al. and Newkirk. Accordingly, Applicants request withdrawal of the rejection of claims 1, 4-13, 17-19, and 21-25 over Tarumi et al. in view of Jonas et al. and Newkirk.

Claim 14 has been rejected under U.S.C. §103(a) as obvious over Tarumi et al. in view of Jonas et al. and Newkirk. In response, Applicants traverse the rejection.

Claim 14 ultimately depends from Claim 1, and therefore includes all the limitations of Claim 1 therein. Therefore, Applicants repeat the above arguments as to why the xerographic component as claimed is not obvious in view of the cited combination.

In view of the above, Applicants submit that Claim 14 is nonobvious in view of the cited references, and request withdrawal of the rejection of Claim 14 under U.S.C. §103(a) as obvious over Tarumi et al. in view of Jonas et al. and Newkirk.

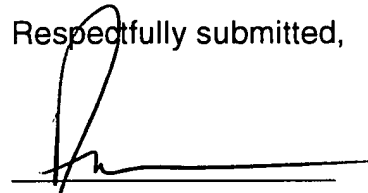
Applicants acknowledge the Examiner's indication that Claim 15 contains allowable subject matter.

In view of the above arguments, Applicants submit that all claims should now be in condition for allowance. Early indication of allowability is respectfully requested.

No additional fee is believed to be required for this amendment. However, the undersigned Xerox Corporation Attorney hereby authorizes the charging of any necessary fees, other than the issue fee, to Xerox Corporation Deposit Account No. 24-0025. This also constitutes a request for any needed extension of time and authorization to charge all fees therefor to Xerox Corporation Deposit Account No. 24-0025.

In the event the Examiner considers personal contact advantageous to the disposition of this case, s/he is hereby authorized to call Applicant's Attorney, Annette L. Bade, at telephone number (310) 333-3682, El Segundo, California.

Respectfully submitted,

A handwritten signature in black ink, appearing to be 'Annette L. Bade', written over a horizontal line.

Annette L. Bade  
Attorney for Applicants  
Registration No. 37,029  
(310) 333-3682

ALB/cmu  
April 17, 2001  
Xerox Corporation  
1990 Xerox Centre Drive  
El Segundo, CA 90245

**VERSION WITH MARKINGS TO SHOW CHANGES MADE:**

**IN THE CLAIMS:**

24. (Twice amended) A xerographic belt component comprising:
- a) a substrate comprising a [material selected from the group consisting of fluoropolymers] fluoropolymer selected from the group consisting of [a)] i) copolymers of vinylidene fluoride, hexafluoropropylene and tetrafluoroethylene; [b)] ii) terpolymers of vinylidene fluoride, hexafluoropropylene and tetrafluoroethylene; and [c)] iii) [and] tetrapolymers of vinylidene fluoride, hexafluoropropylene, [and] tetrafluoroethylene, and a cure site monomer; and thereon
  - b) a coating comprising a thiophene-based material.